OPERATIONAL POLICY

The St Rita's College Child and Youth Risk Management Strategy has been developed in compliance with our obligations under the Working with Children (Risk Management and Screening) Act 2000 and the Working with Children (Risk Management and Screening) Regulation 2011 to promote and protect children and young people.

RATIONALE

The purpose of this strategy is to create and promote a child-safe environment by implementing strategies to identify and minimise risk of harm to children and young people.

As our Mission Statement attests, '*St Rita's College follows the mission of Jesus as lived by the founder of the Presentation Sisters, Venerable Nano Nagle. Our community seeks to inspire engaging, inquisitive and passionate learning, leading to action for a just world*'.

Our six pillars, which are drawn from our Presentation charism and the life of St Rita, underpin all we do: Compassion; Courage; Hospitality; Justice; Simplicity and Hope.

SCOPE

The Child and Youth Risk Management Strategy applies to the entire College Community.

EIGHT MINIMUM REQUIREMENTS OF THE STRATEGY

There are eight minimum requirements which the College must address as part of our Child and Youth Risk Management Strategy. The eight minimum requirements are shown in the diagram below.
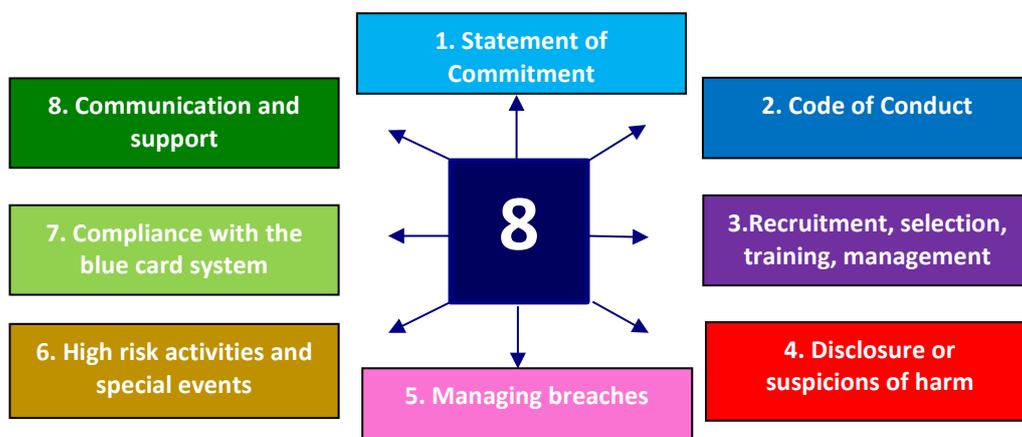
1. Statement of Commitment

St Rita's College is committed to providing education and care to children and young people to assist them to develop into high-achieving, supported students, positively connected to each other and to the communities in which they live and which they will serve.

The College is committed to ensuring the safety and wellbeing of our students and is dedicated to protecting them from harm.

At St Rita's College we have zero tolerance for child abuse. Our child protection responsibilities are of the utmost importance for the College and, as such, the College is committed to providing the necessary resources to ensure compliance with all relevant child protection laws and regulations, and to maintain a safe and supportive environment for all children and young people.

We do this by developing and implementing policies and procedures which form part of our Child and Youth Risk Management Strategy. These processes are in place to protect the safety and wellbeing of young people in our care.

2. Code of Conduct

St Rita's College operates on the philosophy of restorative justice that promotes understanding and acceptance and a commitment to restore relationships and build trust. The College has developed codes of conduct and standards of behaviour for employees, students, volunteers (including parents) and other personnel in consultation with relevant parties. These codes outline the expected standards of behaviour for all members of the College community who interact with young people.

a) *Employee Code of Conduct*

The Employee Code of Conduct applies to all employees engaged on a temporary, casual, fixed term or continuing basis at the College. The College unequivocally commits to fostering the dignity, self-esteem and integrity of every person. To meet this commitment this Code of Conduct has been developed in consultation with relevant parties. The provision of a safe and supportive environment is essential to ensure that all employees and the children and young people entrusted to our care are affirmed in their dignity and worth as a person. St Rita's College believes that children and young people should develop skills in building positive relationships based on those modelled by our employees.

St Rita's College fully endorses the view that a large part of what children and young people learn comes from their observation of others. Hence, in the crucial area of learning how to develop positive interpersonal relationships and social skills, children and young people require suitable role models. This Code of Conduct establishes the basis on which all employees can be such role models for children and

young people. Employees must behave professionally at all times in their interactions with students and observe appropriate boundaries, behaviour and contact with students.

In addition, the Code of Conduct covers the employees' duties in relation to risk management and duty of care obligations to students. It is expected that all St Rita's College employees adhere to principles and practices of child protection as a fundamental responsibility.

b) *Child Safety Code of Conduct*
Our Child Safety Code of Conduct clearly outlines the expected standards of behaviour for all stakeholders interacting with children and young people in our College environments, and the consequences of failing to meet the College's expectations.

College environments include both physical and online environments, as well as those outside the College's grounds where College-related activities are occurring

The Code applies to:

- all staff members, including non-teaching staff and temporary or casual staff;
- volunteers;
- students;
- parents and guardians;
- third party contractors and external education providers;
- Board of Directors and Board Committees;
- teaching students on placement at the College; and
- visitors

c) *Directors Code of Conduct & Board and Committee Guidelines*
The purpose of the Directors Code of Conduct is to provide clear direction for Directors to follow when performing their duties. Each Director acknowledges that his/her position on the Board of St Rita's College involves important legal and ethical responsibilities and a commitment to upholding the values of good corporate citizenship, in both individual conduct and in corporate actions.

The Board and Committee Guidelines set out the religious ethos underpinning decisions of the Board and Committees. The Guidelines also confirm that the Board has an overriding responsibility to act honestly, conscientiously and fairly, in accordance with the law and in the interests of employees, the students of St Rita's College and members of the broader College community. The Directors Code of Conduct and the Board and Committee Guidelines are published on the Board portal.

d) *Volunteers and Other Personnel Code of Conduct*

The St Rita's College Volunteer and Other Personnel Code of Conduct outlines the standard of behaviour which is required of volunteers (including parents) and other personnel in their activities in the College, including the need to think and act safely and treat students and staff with respect.

Other personnel includes music instructors, art instructors and sports coaches who use College property and facilities in order to provide services or instruction to students, but who are not St Rita's employees.

St Rita's takes the following actions to ensure that the Volunteer Code of Conduct is implemented in the College community:

- all volunteers and other personnel are given a copy of the Code of Conduct and are required to comply with it to continue their voluntary engagement at the College;
- volunteers (who are not parents) and other personnel have completed Student Protection Training; and
- all volunteers and other personnel must be captured on the Volunteer and Other Personnel Register.

e) *Behaviour Management*

Behaviour Management within the context of our Mission Statement emphasises Gospel values such as truth, freedom, acceptance and reconciliation. Behaviour Management procedures are designed to encourage all members of our community to work to achieve their full potential. Behaviour Management includes the foundation principles (rights and responsibilities) for students, parents/guardians and teachers. The Behaviour Management policy is printed in the Student Planner and in the Staff Handbook.

f) *Code of Behaviour for Students*

The Code of Behaviour sets out a fair and consistent standard of behaviour for all students at the College. It covers self respect, respect for others, respect for the environment and personal responsibility. The Code of Behaviour has been prepared in consultation with all groups in the College community and has been implemented for a whole College approach to support student behaviour in the College environment. The Code of Behaviour is printed in our annual Student Planner and forms part of the Staff Handbook.

3. Recruitment, Selection, Training and Management

a) Recruitment and Selection

St Rita's College aims to recruit people who are appropriately qualified, eligible and suitable for working with young people. The following policies are in place at the College and must be adhered to by all staff involved in the recruitment process:
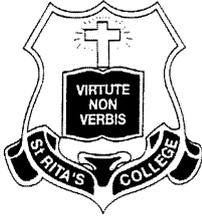
- Guidelines for the Selection, Appointment and Cessation of Directors
- Leadership Framework Policy and Procedures
- Recruitment, Selection and Appointment of Staff
- Managing Unsatisfactory Employee Performance

In advertising new positions for the College, the advertisement must state if that position involves working with children. The appointment of a successful applicant will be subject to satisfactory employment screening for child related employment in accordance with the law.

St Rita's College adheres to policies and procedures in relation to employment which are contained in the Working with Children (Risk Management and Screening) Act 2000, Working with Children (Risk Management and Screening) Regulation 2011, Education (Accreditation of Non-State Schools) Act 2017 and Regulation, and the Education (Queensland College of Teachers) Act 2005.

All teachers are required to produce evidence of current teacher registration with the Queensland College of Teachers (QCT) before they commence work at St Rita's College. All non-teaching employees working at St Rita's College are required to comply with the Blue Card Screening Procedures.
All non-teaching employees, volunteers and trainee students who work with students and who require a Blue Card under the Working with Children (Risk Management and Screening) Act 2000, are required to obtain a Blue Card and keep it current.

b) Training and Management of Employees
All new employees at St Rita's College are provided with induction training on the College's processes and procedures, the values, expectations and the standard of behaviour required of employees in their interactions with students. This promotes an environment that is safe and supportive for students.

All staff must complete mandatory online training in Child Protection Processes every year. Child Protection training covers our responsibilities in relation to reporting by staff of suspicions or allegations of sexual abuse/likely sexual abuse of students, harm or risk of harm to students caused by physical abuse, sexual abuse, emotional abuse or neglect and inappropriate behaviour of staff to students. This training provides staff with skills to effectively respond to and report suspicions or allegations, as required by law. New employees must complete this training within four weeks of commencing work at the College.

The College also encourages staff to attend professional learning courses. Many of the courses offered to employees relate to the safety and wellbeing of students. For example, courses are offered from time to time on bullying, behaviour management of students, cyber security for young people and students at risk of harm.

Where there is a complaint or allegation in relation to an employee of inappropriate behaviour, unsatisfactory performance or misconduct, the Principal will take all appropriate management action, which may include requiring employees to undertake additional training, mentoring employees, suspending an employee or dismissal. All employees are provided with access to an Employee Assistance Program to give free and confidential counselling to employees.

c) Student Wellbeing
At St Rita's College we believe that education is most effective when it happens in an environment built on love, respect and acceptance. At the heart of the College support network is a pastoral care structure that encourages interaction between staff and students, ensuring our students experience a sense of purpose and belonging.

St Rita's has developed a number of policies, processes and resources to support the pastoral care and wellbeing of students. These policies and processes include, but are not limited to:

- Anti-Bullying Policy
- Preventing and Responding to Student Bullying
- Student Protection Policy, Procedures and Guidelines
- Code of Behaviour and Behaviour Management Policy
- Pastoral Care Policy
- Suicide Postvention Preparedness
- Information Technology Use Guidelines
- What to do when – general guidelines in Student Planner
- Evacuation and Lockdown Procedures

St Rita's College has a Pastoral Care team which supports the care and wellbeing of students. The College also employs Guidance Counsellors to work with students and provide pastoral care, personal safety strategies, support for marginalised students and support for students who may be at risk of being harmed.

4. Disclosure or suspicions of harm

Harm is defined as 'any detrimental effect of a significant nature on a child's physical, psychological or emotional wellbeing.' (Section 9 of the Child Protection Act 1999). Disclosure of harm is when someone, including a child, tells you that harm has happened, is happening or is likely to happen to a child. Suspicion of harm is when someone has a reasonable suspicion that a child has suffered, is suffering or is at unacceptable risk of suffering significant harm.

Child Protection Policy

The processes detailed in our 'Student Protection Policy, Processes and Guidelines' were developed by the Queensland Catholic Education Commission (QCEC), in consultation with Catholic School Authorities, in order to meet legislative and procedural processes for responding to, and reporting, abuse, harm, likely harm and behaviour of a staff member that a student considers inappropriate. The College's Child Protection Program as detailed in Complispace is made up of work systems, practices, policies and procedures designed to maintain a safe and supportive environment and to embed an organisational culture of child safety within the College Community.

The 'Student Protection Policy, Processes and Guidelines' provides a process for all staff to recognise, respond and report allegations or suspicions of:

- sexual abuse/likely sexual abuse of students;
- harm or risk of harm to students caused by physical abuse, sexual abuse, emotional abuse or neglect; and
- inappropriate behaviour of staff to students.

The policy sets out a summary of the actions that must be taken if a staff member has concerns or suspicions, or makes allegations about abuse of, or harm to, a student or if there is a report of behaviour by a staff member that a student considers is inappropriate. In general terms the process for responding to and reporting student protection concerns is as follows:

IDENTIFY – Identify student protection concerns through recognising the signs of abuse and harm, and through disclosures or receipt of information.

CONFER - Seek guidance and support – if necessary, confer with the Principal or appropriate colleagues, or use resources such as the Child Protection Guide to establish whether a 'reasonable suspicion' has been formed.

REPORT - Where a reasonable suspicion of abuse, harm or inappropriate behaviour is formed – report the concerns according to the specific processes outlined in this document.

SUPPORT - Remain focused on the support needs of the student and liaise with the Principal around any planning or actions that are required.

Under the Education (Accreditation of Non-State Schools) Regulation 2017 (Section 16(3)), St Rita's College has at least two nominated staff members to whom a student can report behaviour of another staff member that the student considers inappropriate. The names of these Student Protection Contacts are made known to staff, students and parents.

St Rita's College has processes to enable staff to report concerns about student wellbeing, including allegations or suspicions of sexual abuse or likely sexual abuse of a student, harm or risk of harm to a student or inappropriate behaviour of a staff member towards a student. These processes are detailed in our Child Protection Program.

Our 'Student Protection Policy, Processes and Guidelines' have been developed in accordance with the requirements of the Education (Accreditation of Non-State Schools) Act and Regulation 2001, the Education (General Provisions) Act and Regulation 2006, the Working with Children (Risk Management and Screening) Act 2000 and Working with Children (Risk Management and Screening) Regulation 2011, the Child Protection Act 1999 and the Education (Queensland College of Teachers) Act 2005.

The 'Student Protection Policy, Processes and Guidelines' are readily available for employees, parents and students on the College website and on MySRC.

St Rita's College has also developed a Complaints Handling policy to enable staff, parents or students to make a complaint. Parents or students may make a complaint by contacting the staff member concerned, any member of the leadership team or the Principal via phone, e-mail or face to face. The Principal will handle any complaints that are not resolved in the first instance in accordance with the Complaints Handling Policy and/or the 'Student Protection Policy, Processes and Guidelines'.

5.   Managing breaches

St Rita's takes any breach of the Child and Youth Risk Management Strategy seriously. A breach is any action or inaction by any member of the College community, including children and young people, that fails to comply with any part of the strategy.

Breaches may be dealt with as follows:

If the alleged breach relates to the actions of an employee, this will be managed, as appropriate, in accordance with the Employee Code of Conduct, Managing Unsatisfactory Employee Performance Process and the Resolving Complaints Process;

- if the alleged breach relates to a report of inappropriate behaviour of a staff member to a student, this will be managed in accordance with the process set out in the 'Student Protection Policy, Processes and Guidelines';
- if the breach relates to a complaint made via the Complaints Handling Policy, that complaint will be dealt with in accordance with the procedure for handling complaints;
- if the breach relates to the actions of a volunteer, this will be dealt with in accordance with the Volunteer and Other Personnel Code of Conduct and the procedures set out in the 'Student Protection Policy, Processes and Guidelines'.

Records of breaches and complaints will be included on the Breach Register and/or Complaints register, taking into account any requirements for confidentiality.

6.   Risk management plans for high risk activities

a) Risk Management Framework

St Rita's College is committed to providing a safe and just environment for students, staff and the wider community. St Rita's has developed a risk management policy to ensure that:

- The safety of employees, students and the wider community is given the highest priority in their interaction with the College.
- The heritage and mission of the College as a Catholic school that educates in the Presentation tradition, is preserved and enhanced.
- The College conforms to all legal and regulatory requirements.
- Employment policies and practices are established and followed so that staff experience a just workplace.
- The reputation of the College is enhanced through its educational opportunities and service delivery, marketing or fund raising activities.
- The internal financial controls adequately protect the assets of the College.
- Buildings, facilities, equipment, materials, copyright and trademarks are cared for in such a way that characterises responsible stewardship.

The College has also developed a risk management framework to improve risk management throughout the College. Included in the Framework is the Risk Management Process which is adapted from the Standards Australia AS/NZS ISO 31000:2018 Risk Management – Principles and Guidelines. Through monitoring all levels of the College's risk management plans, the Board oversees the College's commitment to safety and good work practices for its staff, students and the wider community.

b) Risk Management for high risk activities

The Principal is responsible to approving all activities which are considered high risk. These may include:
- Camps
- Excursions
- Immersions
- Tours

Prior to any such activity taking place a Risk Assessment must be undertaken by a member of the leadership team. Each risk assessment includes:
- Name of person undertaking the assessment;
- Name and date of event;
- Each key risk category identified;
- A description of what could go wrong;

- Any contributing factors detailing what could contribute to something going wrong;
- Management and controls to be put in place to reduce the identified risks;
- Risk Assessment Action Plan detailing actions to be taken.

c) Other strategies to minimise risk of harm to students

St Rita's College has implemented other strategies to manage risk of harm to students. These include:

- Supervision – Teachers must manage the supervision of students appropriately to ensure that there is adequate and appropriate supervision of students as detailed in the Code of Conduct.
- Critical Incidents – Employees are briefed to appropriately handle emergency situations and critical incidents.
- Fire Evacuation and Lockdown – All employees, students and volunteers are made aware of fire evacuation and lockdown procedures at the College.
- Visitors to the College – Procedures in place for the management of visitors and other outsiders, including relevant signage and directions together with a visitor sign in register and procedures for signing in and out of the College.
- Media/Communications strategies – St Rita's College must obtain the permission of parents/guardians for the use of student photographs and names in any materials issued to the public in printed or electronic form. Identifying information of students is not used in promotional material without the specific permission of the parents/guardians and the students concerned. Specific informed consent must be obtained for any publication of names and photos in media outside the College.
- Computer/Internet - All employees and students are required to abide by the Information Technologies Use Guidelines (students) and the Information and Communications and Technologies Policy (employees).
- Guidance Counselling Service – Guidance Counsellors are employed by the College to offer support and guidance to all students.

7. Compliance with the Blue Card system

a) Blue Card Procedures

St Rita's has developed a Blue Card Procedure which details requirements in accordance with the Working with Children (Risk Management and Screening) Act 2000 to ensure that the required personnel hold a Blue Card.

Employees, relevant direct contact volunteers, coaches and trainee students who work at St Rita's with children under 18 years of age are required to obtain and hold a Blue Card (unless exempt), including:

- all College employees who are not registered with either the Queensland College of Teachers;
- volunteers (who are not parents of enrolled children);

- teachers undertaking practical teaching sessions as part of compulsory academic course requirements;
- self-employed people, paid employees and volunteers whose usual duties include, or are likely to include, the teaching, coaching or tutoring of a child, individually on a commercial basis;
- College Board and Board Committee members.

A centralised register of Blue Card information for all Board members and paid employees, unless exempt, is maintained through data capture in the College's database. St Rita's ensures that details of any Blue Card renewals, applications and changes in status are also followed up as appropriate by the Manager, Community Development.

All teachers must be registered with the Queensland College of Teachers. The Principal sights the original certificates of registration and qualifications before employment commences at the College. The Principal ensures that new non-teaching employees must hold or have applied for a Blue Card prior to commencing work at the College.

St Rita's maintains a register of Blue Card information for all volunteers, unless exempt. Volunteers who require a Blue Card under the Working with Children (Risk Management and Screening) Act 2000 must obtain the Blue Card before commencing work.

b) **Procedures for reviewing the Child and Youth Risk Management Strategy**
The Child and Youth Risk Management Strategy forms part of the catalogue of College policies, procedures and guidelines. To ensure it remains current and effective, the strategy will be monitored and reviewed annually. The review will include:
- whether policies and procedures were followed;
- whether any incidents relating to children and young people's risk management issues occurred;
- the actual process used to manage any incidents;
- the effectiveness of policies and procedures in preventing or minimising harm to children and young people; and
- the content and frequency of training in relation to Child and Youth Risk Management Strategies.

Following the review, employees, parents and volunteers will be advised of any changes to policies and procedures as a result of the review and where appropriate, training will be provided.

8. Communication and Support

The Child and Youth Risk Management Strategy is uploaded on the College website together with the Student Protection Policy, Processes and Guidelines.

The Principal implements and communicates St Rita's Child and Youth Risk Management Strategy to parents, employees, volunteers and other personnel by:

- Placing the Child and Youth Risk Management Strategy on MySRC and the College website;
- Providing training to the employees and volunteers on Child Protection policies and procedures;
- Regularly communicating with the College community:
  - at College at functions,
  - via the College newsletter,
  - through notices on MySRC,
  - via e-mail to staff, students and parents.

ACCOUNTABILITY

Role	Responsible for
Principal	Oversight and review of this policy
Leadership Team	Implementation, compliance and reporting
Manager, Community Development	Implementation of the day to day processes that support this policy.

ASSOCIATED DOCUMENTS

Description	Document Type
Student Protection Policy (Processes and Guidelines)	Policy
Employee Code of Conduct	Code of Conduct
Child Safety Code of Conduct	Code of Conduct
Code of Behaviour	Code of Conduct
Directors Code of Conduct	Code of Conduct
Volunteers and Other Personnel Code of Conduct	Code of Conduct
Risk Management Policy & Risk Management Framework	Policy
Complaints Handling Policy	Policy
Blue Card Procedures	Procedures

REVIEW AND APPROVAL

Version	Author	Authorisation	Approval Date	Next Review
V1.0	Business Manager	Principal	1 March 2019	2020